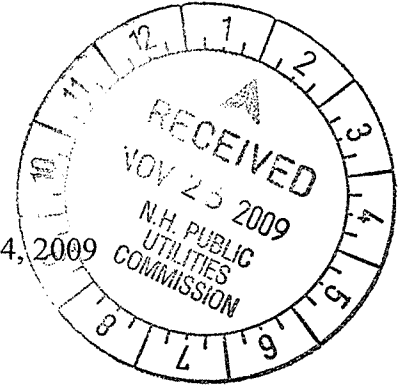


WILLIAM P. SHORT III
P.O. Box 237173
New York, New York 10023-7173
(917) 206-0001; (201) 970-3707
w.shortiii@verizon.net

November 24, 2009



Ms. Debra A. Howland
 Executive Director and Secretary
 New Hampshire Public Utilities Commission
 21 South Fruit Street, Suite 10
 Concord, New Hampshire 03301-2429

Re: Request For Certification As An Independent Monitor

Dear Ms. Howland:

Per PUC 2500.09 **Independent Monitor**, I, William P. Short III, request certification by the New Hampshire Public Utilities Commission ("NHPUC") as an Independent Monitor.

My name is William P. Short III.

My business, mailing and e-mail addresses are as follows:

Business Address:

William P. Short III
 Consultant
 44 West 62nd Street
 New York, New York 10023-7008
 Tel: (917) 206-0001
 Fax: (917) 206-0001
 Cell: (201) 970-3707
 w.shortiii@verizon.net

Mailing Address:

William P. Short III
 Consultant
 P.O. Box 237173
 New York, New York 10023-7173
 Tel: (917) 206-0001
 Fax: (917) 206-0001
 Cell: (201) 970-3707
 w.shortiii@verizon.net

Presently, I am certified as an Independent Third Party Meter Reader ("ITPMR") by the Massachusetts Department of Energy Resources ("Mass DOER").¹ Howard B. Bernstein, Mass DOER Renewable & Alternative Energy Portfolio Standards Program Manager, personally interviewed me and approved my request for certification based upon my knowledge of the Massachusetts renewable energy statutes and regulations² and the operating rules of the New

¹ I believe that a Massachusetts ITPMR is equivalent to a New Hampshire Independent Monitor and satisfies the criteria specified in PUC 2505.09 (c) (6).

² <http://www.mass.gov/Eoeea/docs/doer/rps/225cmr1400-052909.pdf>

England Power Pool Generation Information System ("NEPOOL GIS")³ and satisfaction of the requirements outlined in Appendix F.2 of its Statement of Qualification Application ("SQA").⁴ A copy of a completed Appendix F.2 for Richey Properties and the e-mail from Howard B. Bernstein that certified me as ITPMR for that facility are attached to this letter. A copy of a completed Appendix F.2 for Williams Stone and the letter from Robert Sydney, Mass DOER General Counsel, that certified me as ITPMR for that facility are also attached to this letter.⁵

Based upon my certification by the Mass DOER, I was certified as a Verifier by APX, Inc., the GIS Administrator of the NEPOOL GIS.⁶ Among others, I verify the behind the meter consumption of the on-site generation for Mark Richey Woodworking (Non-MSS #32749), Williams Stone (Non-MSS #32828), PPL EnergyPlus Great Works (Non-MSS #32802) and Red Shield Acquisition, LLC d/b/a Old Town Fuel & Fiber (Non-MSS #32800).⁷

I, in the sole capacity as an independent consultant, have been retained by each of these entities to perform, among other things, meter verification services.

I am thoroughly familiar with the NEPOOL GIS and all aspects of the requirements of the New Hampshire RPS for Class I, II, III and IV sources, including the requirements of Independent Monitors. If I am approved as an Independent Monitor, I intend to offer my services to those New Hampshire generators with a generation nameplate of 500 KW or larger.⁸

I have no direct or indirect ownership interest in any of these entities or any affiliate of these entities. My business relationship with each of these entities is solely that of an independent consultant.

I am either paid a fixed fee or an hourly rate for my services.⁹ None of my compensation is (or will be) subject to adjustment for the increase or decrease in the production of Certificates by these facilities or changes to the sales prices (or lack of sales) of Certificates. There is no way, unless my consulting agreement with an entity is modified, that I cannot be qualified as an Independent Monitor. If my business relationship should change with any of these entities, either that entity or I will immediately inform the NHPUC of such modifications.

At the beginning of my retention for meter verification services, I intend to inspect my clients' meter(s) for accuracy and the capability to measure and record the power produced.¹⁰

³ <http://www.nepoolgis.com/GeneralDoc/GIS%20Operating%20Rules%207.1.09.DOC>

⁴ <http://www.mass.gov/Eoeea/docs/doer/rps/rps-1-stateq-inst-mar-4-2009.pdf>

⁵ The State of Maine has no regulations for Independent Monitors, Verifiers, Independent Third Party Meter Readers, Third Party Meter Readers or their equivalent.

⁶ <https://www.nepoolgis.com/myModule/rpt/myrpt.asp?r=1&t=Verifier%20Account%20Holder%20Type&TabName=Verifier>

⁷ If the application for Indeck Energy – Alexandria is approved for New Hampshire Class I RPS treatment to its generation which is consumed as parasitic load, I expect that I would be retained to verify the behind the meter consumption of this on-site generation of Indeck Energy – Alexandria (Non-MSS #32836).

⁸ A list of such services is attached to this letter.

⁹ I have no specific charge for meter verification services; but rather, I charge for up to eight separate sets of services. My charges vary considerably based upon the services requested as well as the term of contract.

¹⁰ To the extent that I need the services of the persons with the qualifications listed in PUC 2505.09(c)(1) through (5), I will hire such person and require my client to pay for his services.

Although I may report on an annual basis, I intend to read and report these facilities' production on a monthly basis to the NEPOOL GIS.¹¹ At least annually, the meters will be inspected by me and their production compared against the readings of the remote meter reading interface to ensure the accuracy of the remote readings. In the event that there is a discrepancy, I will have the meter re-calibrated and an appropriate adjustment made to the entity's NEPOOL GIS account.¹²

Upon your review of my application, if you have any questions or concerns, please do not hesitate to contact me.

Sincerely yours,



enclosures

cc: William R. Garth (e-mail only)
Michael D. Ferguson (e-mail only)

¹¹ I require that each facility have a metering arrangement similar to that of Mark Richey Woodworking, where the wind turbine production is read on-line in real-time with hourly, daily and monthly totals calculated automatically. The production of this wind turbine may be viewed at http://www.markrichey.com/our_facility/wind-turbine-real-time-display.cfm.

¹² To the extent that I need the services of the persons with the qualifications listed in PUC 2505.09(c)(1) through (5), I will hire such person and require my client to pay for his services.

List of Services Offered by William P. Short III

1. Assist with the registration, creation and sale of the NEPOOL GIS certificates generated by its generator.
2. Assist with the registration of its generator as a Massachusetts Class I, Class II, Class II Waste-To-Energy or Class APS renewable (or alternative) energy generation unit, a Connecticut Class I, II or III renewable energy source, a Rhode Island New or Existing Renewable energy resource, a New Hampshire Class I, II, III or IV renewable energy source and a Maine Class I or II renewable resource to the extent that its generator is not presently certified as such sources.
3. Act an Independent Third Party Meter Reader as that term is defined by the Massachusetts Department of Energy Resources (or equivalent person in the States of Connecticut, New Hampshire and Rhode Island) for the NEPOOL GIS certificates generated by its generator.
4. Advise, at least once each quarter, and otherwise whenever significant market developments dictate, with a report or reports on the various New England States renewable portfolio standard programs with respect to supply of and requirement for NEPOOL GIS certificates capable of satisfying each such programs.
5. Assist with the purchase of NEPOOL GIS certificates that qualify for one or more of New England's Renewable Portfolio System Programs equal to the electrical load of its generator.
6. Assist with membership in the New England Power Pool as a member of the End User Sector, purchasing its electrical load from the wholesale power markets.
7. Assist with membership in the New England Power Pool as a member of Alternate Renewable Sector, selling the net output of its generator in the wholesale power markets.
8. Assist with the purchase of Regional Greenhouse Gas Initiative ("RGGI") Allowances or Offsets equal to the carbon footprint of its generator.

APPENDIX F. 2

INDEPENDENT, THIRD PARTY METER READERS

iii. William P. Short III, an independent consultant, has been retained by Richey Properties, LLC to perform, among other things, meter reading services for Richey Properties' wind turbine, located in Newburyport, Massachusetts.

Mr. Short maintains an office at 44 West 62nd Street, New York, New York with a mailing address of P.O. Box 237173, New York, New York 10023-7173. His telephone numbers are (917) 206-0001 and (201) 970-3707. His e-mail address is w.shortiii@verizon.net.

Mr. Short is thoroughly familiar with the NEPOOL GIS and all aspects of the requirements of the Massachusetts RPS for Class I Resources, including the requirements of Third Party Meter Readers.

iv. Mr. Short has no direct or indirect ownership interest in Richey Properties, LLC, Mark Richey Woodworking or any affiliate of these entities. Mr. Short's business relationship with Richey Properties is solely that of an independent consultant.

v. Since Mr. Short is paid a fixed fee for his services, there is no way, unless his consulting agreement is modified, that he cannot be qualified as a Third Party Meter Reader. If Mr. Short's business relationship with should change with Richey Properties, LLC, Richey Properties, LLC will immediately inform DOER of such modifications.

vi. For 2009 Mr. Short will be paid a flat, fixed fee for his services. His agreement, which runs until the end of the 2009 compliance year, can be terminated by Richey Properties, LLC at anytime without cause provided that Mr. Short has been paid his fixed fee. None of Mr. Short's compensation will be subject to adjustment for the increase or decrease in production of Certificates by the wind turbine.

vii. On a monthly basis, Mr. Short intends to read and report the wind turbine's production to the NEPOOL GIS. At least annually, the meter will be inspected by Mr. Short and its production compared against the readings of the remote meter reading interface to ensure the accuracy of the remote readings.

Bill Short

From: Bernstein, Howard (ENE) [Howard.Bernstein@state.ma.us]
Sent: Friday, July 10, 2009 4:35 PM
To: gparici@markrichey.com
Cc: Karp, Courtney Feeley (ENE); Howlett, Natalie (ENE); Sydney, Robert (ENE); Bill Short; James Webb; Breger, Dwayne (ENE); Rps, Doer (ENE)
Subject: DOER qualiflies Richey Wind for RPS Class I and Wm Short as ITPMR

Dear Ms. Parisi,

This email is to inform you that DOER has qualified Richey Wind as a MA RPS Class I Generation Unit as of this date and has entered that information in the unit's Generation Asset account at the NEPOOL GIS. However, it might be some days before you receive the Statement of Qualification signed by Commisioner Philip Giudice.

In addition, this email is to inform you that DOER hereby approves William P. Short III as the independent Third Party Meter Reader (a.k.a. Independent Third Party Verifier) for Richey Wind. Accordingly, DOER authorizes the NEPOOL GIS Adminstrator to allow Mr. Short to establish and use an account at the GIS as the Third Party Meter Reader, as provided in Rule 2.5(j) and elsewhere in the NEPOOL GIS Operating Rules for the purpose of entering electicial generation data for Richey Wind.

Please inform me if Richey Properties, Mr. Short, or the NEPOOL GIS needs more formal authorization than this email, and I will provide it within the required time period. Also please inform me of the establishment of the Third Party Meter Reader account. Finally, Richey Properties must inform DOER of any substantive change in the relationships between Richey Properties and Mr. Short, including the replacement of Mr. Short as the ITPMR for Richey Wind or any changes that could affect Mr. Short's qualification to serve in the capacity of independent Third Party Meter Reader.

Howard B. Bernstein
RPS Program Manager
MA Department of Energy Resources

Creating a Greener Future Through Sustainable Energy
(617) 626-7355 (direct line)
<http://www.mass.gov/doer/>

APPENDIX F. 2

INDEPENDENT, THIRD PARTY METER READERS

iii. William P. Short III, an independent consultant, has been retained by Williams Stone Company, Inc. to perform, among other things, meter reading services for Williams Stone's wind turbine, located in East Otis, Massachusetts.

Mr. Short maintains an office at 44 West 62nd Street, New York, New York with a mailing address of P.O. Box 237173, New York, New York 10023-7173. His telephone numbers are (917) 206-0001 and (201) 970-3707. His e-mail address is w.shortiii@verizon.net.

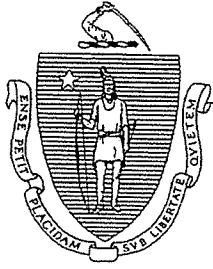
Mr. Short is thoroughly familiar with the NEPOOL GIS and all aspects of the requirements of the Massachusetts RPS for Class I Resources, including the requirements of Third Party Meter Readers.

iv. Mr. Short has no direct or indirect ownership interest in Williams Stone Company, Inc. or any affiliate of this entity. Mr. Short's business relationship with Williams Stone Company, Inc. is solely that of an independent consultant.

v. Since Mr. Short is paid a fixed fee for his services, there is no way, unless his consulting agreement is modified, that he cannot be qualified as a Third Party Meter Reader. If Mr. Short's business relationship should change with Williams Stone Company, Inc., Williams Stone Company, Inc. will immediately inform DOER of such modifications.

vi. For 2009 through 2012 Mr. Short will be paid a flat, fixed fee for his services. His agreement, which runs until the end of the 2011 compliance year, can be terminated by Williams Stone Company, Inc. at anytime without cause provided that Mr. Short has been paid the remaining balance of his fixed fee. None of Mr. Short's compensation will be subject to adjustment for the increase or decrease in production of Certificates by the wind turbine.

vii. On a monthly basis, Mr. Short intends to read and report the wind turbine's production to the NEPOOL GIS. At least annually, the meter will be inspected by Mr. Short and its production compared against the readings of the remote meter reading interface to ensure the accuracy of the remote readings.



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF
ENERGY AND ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENERGY RESOURCES
100 CAMBRIDGE ST., SUITE 1020
BOSTON, MA 02114
Internet: www.Mass.Gov/DOER
Email: Energy@State.MA.US

Deval L. Patrick
Governor

Timothy P. Murray
Lieutenant Governor

Ian A. Bowles
Secretary, Executive Office of Energy
and Environmental Affairs

Philip Giudice
Commissioner

TELEPHONE
617-626-7300

FACSIMILE
617-727-0030
617-727-0093

November 5, 2009

William P. Short, III
Williams Stone Company, Inc.
P.O Box 237173
New York, NY 10023-7173

RE: RPS Class I Eligibility Decision
Williams Stone, 0.600 MW in East Otis, MA (WD 1134-09)

Dear Mr. Short,

On behalf of the Department of Energy Resources (the Department), I am pleased to inform you that the Statement of Qualification Application for the Williams Stone wind project pursuant to the Massachusetts Renewable Energy Portfolio Standard (RPS) – Class I Regulations is hereby approved. The Department finds that the Generation Unit meets the requirements for eligibility as an RPS Class I Renewable Generation Unit pursuant to 225 CMR 14.05.

Each Massachusetts Class I Renewable Generation Unit is assigned a unique Massachusetts RPS Class I Identification Number (MA RPS Class I ID#). The MA RPS Class I ID# stated on the Statement of Qualification must be included in all correspondence with the Department. Williams Stone wind project's MA RPS Class I ID# is **WD-1134-09**.

The Department wishes to remind you of the notification requirements for changes in eligibility status contained in 225 CMR 14.06(3) and for changes in capacity, contact information, Authorized Representative, and identity of the Owner or Operator contained in 225 CMR 14.06(6). The Owner or Operator of the Generation Unit shall submit notification of such changes to the Department no later than five days following the end of the month during which such changes were implemented.


Second, the Department calls your attention to the Independent Third Party Meter Reader (ITPMR) requirements for Generation Units whose output is not reported to the NEPOOL GIS via the ISO New England, pursuant to 225 CMR 14.05(1)(c). RPS Class I qualification of the output of the Unit includes DOER approval of the ITPMR for the Unit, William P. Short III. Either you personally or Williams Stone Company, Inc., must inform DOER of any substantive change in the relationships between Williams Stone and Mr. Short that could affect Mr. Short's qualification to serve in the capacity of ITPMR. In the event that Williams Stone decides to engage a different entity as the Unit's ITPMR, then Williams Stone's new choice also must be approved by DOER as a condition of continued qualification of the Unit's electricity output. Also note that the ITPMR must maintain detailed records of the monthly meter readings of the Unit, and that those records are subject to inspection by the Department.

Third, the Department calls your attention to the provision requiring that the amount of the RPS qualified generating capacity must not be committed to any Control Area other than the ISO New England Control Area, pursuant to 225 CMR 14.05(1)(e)1.

Finally, the Department wishes to remind you to be cognizant of the Operating Rules and the reporting requirements of the NEPOOL GIS, which may be amended from time to time, and compliance with which may affect the RPS qualification of your Generation Unit's GIS certificates.

If you have any questions or concerns about the Statement of Qualification or any aspect of the RPS program, please contact Howard Bernstein, RPS Program Manager, at the Department's address, or (617) 626-7355, or howard.bernstein@state.ma.us.

Sincerely,


Robert Sydney
General Counsel

CC: Edwin Williams, CEO, Williams Stone Company, Inc.

Encl: Statement of Qualification

Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
DEPARTMENT OF ENERGY RESOURCES

STATEMENT OF QUALIFICATION

**Pursuant to the Renewable Energy Portfolio Standard – Class I
225 CMR 14.00**

This Statement of Qualification, provided by the Massachusetts Department of Energy Resources (DOER or the Department), signifies that the Generation Unit identified below, as described in a Statement of Qualification Application dated September 8, 2009, meets the requirements for eligibility as an RPS Class I Renewable Generation Unit, pursuant to the Renewable Energy Portfolio Standard – Class I, 225 CMR 14.05. Therefore, this Generation Unit is duly qualified as an RPS Class I Renewable Generation Unit, as of this 10th day of October, 2009.

Generation Unit Name, Capacity,
and Location:

Williams Stone
0.600 MW
East Otis, MA

Authorized Representative's Name
and Address:

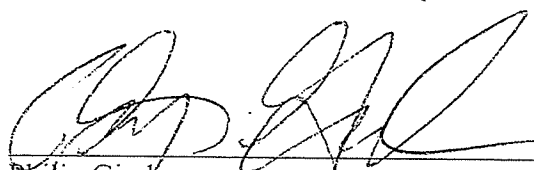
William P. Short III
Williams Stone Company, Inc.
P.O Box 237173
New York, NY 10023-7173

This RPS Class I Renewable Generation Unit is assigned a unique Massachusetts RPS Identification Number, listed below. Please include the ID number on all correspondence with DOER.

MA RPS Class I ID #: WD-1134-09

This Unit's NEPOOL GIS Identification Number is: **NON 32828**

The Qualification of this Generation Unit is subject to all applicable provisions in 225 CMR 14.00, including but not limited to the following. Pursuant to 225 CMR 14.05(1)(e)1, the Qualification of this Unit is subject to the Capacity Obligation provisions that pertain to all Generation Units. Pursuant to 225 CMR 14.06(5) and (6), the Owner or Operator of the Unit is obligated to notify DOER of any changes in the characteristics of the Unit that could affect its eligibility status, as well as any changes in the Unit's ownership, generation capacity, Third Party Meter Reader, Authorized Representative, or contact information. DOER may suspend or revoke this Statement of Qualification if the Owner or Operator fails to comply with 225 CMR 14.00, including the provisions of this Statement of Qualification.


Philip Giudice
Commissioner

Department of Energy Resources

Date: October 10, 2009